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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Thomas A. O'Connell, Plaintiff, v. American Express Company, Bank of America, JPMorgan Chase Bank, NA, Franklin Capital Corporation, Shell/CBNA,	Case No.: 2:18-cv-00743-RFB-CWH Stipulation for an extension of time for Plaintiff to Respond to Defendant's Motion to Dismiss [ECF No. 27] (Second Request)
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Plaintiff Thomas A. O'Connell ("Plaintiff") and Bank of America ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **August 1, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's Complaint, filed on June 20, 2018, ECF No. 27. Plaintiff's Response is currently due on July 18, 2018.

1 In good faith and not for the purposes of delay, Plaintiff requested the
2 extension to allow additional time for the parties to discuss resolution, since
3 settlement discussions are still ongoing. Plaintiff is also considering requesting
4 leave to amend the Complaint instead of opposing Defendant's motion. The Parties
5 in good faith stipulate to allow additional time for Plaintiff to respond to the
6 Motion. This is the second request for an extension of this deadline.

7 The Parties therefore stipulate that Plaintiff's response to Defendant's motion
8 to dismiss, ECF. No. 27, shall be due on or before **August 1, 2018**.

9 DATED this 13th day of July 2018.

10 **KAZEROUNI LAW GROUP, APC**

11 By: /s/ Michael Kind
12 Michael Kind, Esq.
13 6069 South Fort Apache Road, Suite 100
14 Las Vegas, Nevada 89148
15 *Attorneys for Plaintiff*

16 **Akerman LLP**

17 By: /s/ Rex Garner
18 Rex Garner, Esq.
19 1635 Village Center Circle, Suite 200
20 Las Vegas, NV 89134
21 *Attorneys for Defendant*

22 IT IS SO ORDERED:



23 RICHARD F. BOULWARE, II
24 United States District Court

25 DATED: July 16, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on July 13, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

Michael Kind

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